

FS-1 Closure Plan Comments

Editorial Comments

1. Page H1-2 Figure 1 and Page A-2 Figure A-1 – Please use a different color to show the boundary of the FS-1 unit as it is not visible when photocopied.
2. Page H1-1 Section H1.3 and Page A-1 Sections A1.1/A1.1.1 – Section H1.3 uses units of “meters (ft)” while Sections A1.1/A1.1.1 use “meters (yd)”. Please use “meters (ft)” consistently (and also ft², ft³).
3. Page A-11 Section A3.9, 1st sentence – Missing word, should read “The sampling and analysis plan summarizes...”.
4. Page A-25 Section A3.9.13 – The reference to Table A-4 should be to Table A-7.
5. Page A-1 Section A1.1.1 – Please verify the maximum waste inventory numbers. I thought these were drums of waste stored in FS-1 but perhaps not. If so, 4 drums of MLLW at 0.208 m³ per drum should be less than 1 m³ not 12 m³. Similarly, 7 drums of TSCA waste would be about 1.5 m³ not 5 m³. The conversion of 5 m³ to 171 yd³ is also not correct.

Remaining EPA Comments

1. Page H1-1 Section H1 – Change sentence to read “Addendum H.1 discusses closure activities for dangerous waste management units in the Low-Level Burial Ground (LLBG) Trenches 31-34-94 Operating Unit Group (OUG).” [FS1-1]
2. Page H1-1 Section H1.1 – Change the first sentence to read “...and operated by U.S. Department of Energy (DOE) and its contractor CH2M Hill Plateau Remediation Contractor (CHPRC).” [FS1-2]
3. Page H1-1 Section H1-5 – Insert the words “(not included in this Closure Plan)” for the Trenches 31 and 34 Disposal Cells and Waste Storage and Treatment Pads, similar to the Trench 94 Disposal Cell. [FS1-3]
4. Page A-1 Section A1 – Change the second to last sentence to read “...and represents the baseline for closure and the enforceable compliance requirements for conducting closure.” [FS1-4]
5. Page A-7 Section A3.3 – The conclusion that only confirmation sampling is needed for FS-1 is based on more than just the visual inspection but the text makes it sound that way. Change the second to last paragraph to two paragraphs that read [FS1-10]:

A visual inspection was completed on July 31, 2013 to identify any dangerous waste related staining in FS-1. No waste related staining was identified during the visual inspection.

Based on the operating record review, waste management records, and the visual inspection, then only confirmation sampling and analysis will be performed.

6. Page A-16 section A3.9.6 – See Ecology publication 94-49, “Guidance on Sampling and Data Analysis Methods”. *Some background:* Subsurface sampling should be conducted unless there is good evidence that any existing soil contamination is confined to the surface soil. For example, a hazardous substance was deposited from the air or has a low mobility in soil. Also, some contaminants may be volatile and

should not be sampled at the surface as natural processes may cause the surface concentrations to be diminished. *The comment:* Explain the depth range selected to represent surface soil, and provide justification for the selection, a description of the methods used to sample the surface soil, the rationale for removing the gravel before sampling, and for screening the sample to <2 mm particle size. [FS1-14]

7. Page A-18 Section A3.9.8 – In light of not having a separate QAPjP we need to ensure all the elements are still addressed, and most are. Need to state that a data quality assessment will be performed in accordance with EPA/600/R-96/084, “Guidance for Data Quality Assessment” (I believe this is what CHPRC uses for this). Also, need to clarify that data verification, validation, and DQA includes both the primary samples and the quality control samples that are collected. [FS1-16]
8. Page A-19 Table A-7 – A footnote is needed that says where there is both a Carcinogen entry and a Non-Carcinogen entry, that the lowest value will be used. [FS1-17]
9. Page A-19 Table A-7 – The Accuracy Requirements is shown as “NA” for some COPCs. Footnote C says that historical performance of the laboratory will be used for these. This has no real basis and further explanation is needed. As an alternative, see DOE/RL-2007-02, “Supplemental RI/FS Work Plan for the 200 Areas Central Plateau Operable Units”, Table A2-2 which provides analytical performance requirements for nonradionuclides. This table provides numerical accuracy requirements (most are 70-130%) that can be used for the missing FS-1 COPCs. [FS1-17]
10. Page A-26 Section A3.12 – Delete the last sentence that says “A permit modification request will be submitted after clean closure has been confirmed to remove FS-1 from the sitewide permit active DWMUs.” There is a question as to whether a permit mod is needed since the CAFO closure units were not in the permit to begin with.
11. Page A-26 Section A4 – Second to last sentence reads “The extension request would also demonstrate that all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements, have been and will be taken.” Need to also state that the extension request will include demonstration of compliance with the criteria in WAC 173-303-610(4)(b)(i) or (ii). [FS1-20]
12. Page B-1 Summary of Sampling Design Table – The entry for the Size of Grid is too small and not correct. [FS1-22]